

**THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

JAB Energy Solutions II, LLC, *et al.*,

Debtor.

Chapter 11

Case No. 21-11226 (CTG)

**TURNKEY OFFSHORE PROJECT SERVICES, LLC'S AND OFFSHORE TECHNICAL
SOLUTIONS, LLC'S EXHIBIT LIST FOR OMNIBUS HEARING ON OCTOBER 25,
2021 AT 3:00 P.M. (EASTERN TIME)**

Turnkey Offshore Services Project, LLC (“TOPS”) and Offshore Technical Solutions, LLC (“OTS”), disclose that they intend to introduce and/or reserve the right to introduce the following exhibits at the October 25, 2021 hearing on the *Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Lenders, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing and (V) Granting Related Relief* [D.I. 27] (the “DIP Motion”):

EXHIBITS

1. TOPS and OTS reserve the right to submit any rebuttal exhibit or exhibit identified by any other party to this contested matter. *See* Reservation of Rights, *infra*.

No.	Description	Docket No. or Exhibit Ref.
1	<i>Declaration of Albert Altro, Chief Restructuring Officer in Support of the Debtor's Chapter 11 Petition and First Day Relief</i>	<u>24</u>
2	<i>The Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Lenders, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing and (V) Granting Related Relief, and related exhibits</i>	<u>27</u>
3	<i>Interim Order (I) Authorizing the Debtor to (A) Obtain Postpetition</i>	<u>47</u>

	<i>Financing and (B) Utilize Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Lenders, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing and (V) Granting Related Relief, and related exhibits</i>	
4	<i>The Preliminary Objection of Turnkey Offshore Project Services, LLC to the Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Lenders, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing and (V) Granting Related Relief, and related exhibits</i>	<u>70</u>
5	<i>The Debtor's Reply in Support of the Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Lenders, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing and (V) Granting Related Relief, and related exhibits</i>	<u>80</u>

RESERVATION OF RIGHTS

2. TOPS and OTS reserve the right to supplement these designations in all respects, including without limitation by using additional witnesses or exhibits, as necessary. TOPS and OTS reserve the right to call rebuttal witnesses to any fact witnesses disclosed or called by any party in this contested matter. TOPS and OTS reserve the right to call any witnesses identified by any party in this contested matter. TOPS and OTS reserve the right to add additional witnesses upon notice to the Court and the other parties to this contested matter. TOPS and OTS reserve the right to refer to the DIP Motion, objections thereto, and any replies in support thereof. TOPS and OTS reserve the right to add additional exhibits upon notice to the Court and other parties. TOPS and OTS reserve the right to not use any exhibit, as identified herein.

Dated: October 25, 2021
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

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